

SO ORDERED

s/James B. Clark

James B. Clark, U.S.M.J.

Date: 1/13/2025

PAUL S. GROSSWALD, ESQ., LLC  
Attorney at Law

98 West End Avenue  
Summit, NJ 07901

777 Westchester Ave., Ste. 101  
White Plains, NY 10604

January 10, 2025

VIA CM/ECF

Hon. James B. Clark  
United States District Court for the District of New Jersey  
50 Walnut Street, Courtroom 2060  
Newark, NJ 07102

\*The final pretrial conference  
is adjourned to March 24, 2025  
at 2:00 pm.

\*The parties' proposed final  
pretrial order shall be  
submitted by March 13, 2025.  
\*Any motion seeking leave to  
amend shall be filed by February 9, 2025.

Phone: (718) 694-9442  
Fax: (212) 671-1321  
pgrosswald@hotmail.com

Admitted in NJ & NY

Re: Ramirez v. World Mission New Jersey, et al., Docket No. 2:14-cv-01708 (District  
of New Jersey)

Dear Judge Clark:

I represent Plaintiff Michelle Ramirez in the above-referenced matter. On November 20, 2024, Your Honor ordered that a draft of the parties' final pretrial order shall be due on January 13, 2025, with the telephonic settlement/final pretrial conference to be held on January 23, 2025. [ECF 302.] Then, on December 3, 2024, Judge Semper issued an order denying Defendants' Rule 60(a) motion. [ECF 303.] In that order, Judge Semper stated in a footnote that "Plaintiff may opt to seek leave to file an amended complaint pursuant to the Court's April Opinion and Order." I am still in the process of evaluating whether and to what extent Plaintiff will seek to amend the complaint pursuant to Judge Semper's rulings. I have also engaged in additional settlement discussions with Defendants' counsel in response to Judge Semper's December 3 ruling. Therefore, I believe that the filing of a pretrial order is premature at this time. I am respectfully requesting an adjournment of the dates set forth in the November 20, 2025 order for at least sixty days. All Defendants' counsel have consented to this request. Thank you for your prompt attention to this matter.

Sincerely,

*Paul Grosswald*

PAUL S. GROSSWALD

cc: Steven L. Procaccini, Esq.  
Steven Vanderlinden, Esq.